

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:22-cv-10077-DPW

KARYN DRAGO

Plaintiff

v.

RYAN FRIAS, JOHN GAUDET,  
JAMES JOHNSON, DENNIS KING,  
SALEM POLICE DEPARTMENT  
CITY OF SALEM, MA

Defendants

PROPOSED JOINT SCHEDULING STATEMENT

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(d) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the Plaintiff and counsel for the Defendant have conferred and submit the following proposed Joint Scheduling Statement:

Joint Discovery Plan and Motion Schedule

1. Initial Disclosures. Initial disclosures required by Fed. R. Civ. P. 26(a)(1) must be completed by July 27, 2022.
2. Amendments to Pleadings. Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after December 1, 2022.
3. Fact Discovery.
  - a. Written discovery (requests for production of documents, interrogatories and request for admissions) must be completed by March 1, 2023.

- b. All depositions, other than expert depositions, must be completed by May 1, 2023.
- 4. Status Conference. NOTE: The Court will schedule a status conference shortly after the close of fact discovery to discuss case management issues such as the need for expert discovery and dispositive motions.
- 5. Expert Discovery.
  - a. Plaintiff's trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by August 30, 2023.
  - b. Plaintiff's trial experts must be deposed by September 30, 2023.
  - c. Defendants' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by September 30, 2023.
  - d. Defendants' trial experts must be deposed by October 30, 2023.
- 6. Dispositive Motions.
  - a. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by November 30, 2023.
  - b. Oppositions to dispositive motions must be filed within twenty-one (21) days after service of the motion.
  - c. Reply memoranda are permitted, provided that such reply memorandum does not exceed ten pages, is double-spaced, and is filed within twenty-one (21) days after service of the opposition papers.

Defendants,  
By their attorneys,

/s/ Elizabeth F. Scian  
Douglas I. Louison (BBO# 545191)  
dlouison@lccplaw.com  
Elizabeth F. Scian (BBO# 706565)  
Lscian@lccplaw.com  
Louison, Costello, Condon & Pfaff, LLP  
Ten Post Office Square, Suite 1330  
Boston, MA 02109  
(617) 439-0305

/s/ Paul Pappas  
Paul Pappas, Esq.  
BBO# 549528  
280 Merrimack St.  
Methuen, Ma. 01844  
978.686.9000  
Pappas3858@yahoo.com

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on **July 13, 2022**.

/s/ Elizabeth F. Scian  
Elizabeth F. Scian